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Counsel for the Liquidating Trustee

# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re : Chapter 11

SEARS HOLDINGS CORPORATION, et al., :

Case No. 18-23538 (SHL)

Debtors.<sup>1</sup> : (Jointly Administered)

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# NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING TO BE CONDUCTED THROUGH ZOOM ON NOVEMBER 17, 2022 AT 2:00 P.M.

Location of Hearing: United States Bankruptcy Court for the Southern District of New York, before the Honorable Sean H. Lane, United States Bankruptcy Judge, 300 Quarropas Street, White Plains, New York 10601-4140

<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); SR – Rover de Puerto Rico, LLC (f/k/a Sears, Roebuck de Puerto Rico, Inc.) (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Rover Brands Business Unit, LLC (f/k/a Sears Brands Business Unit Corporation) (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is c/o M-III Partners, LP, 1700 Broadway. 19th Floor, New York, NY 10019.

PLEASE TAKE NOTICE that the United States Bankruptcy Court for the Southern District of New York (the "Court") has entered General Order M-543 to protect public health, and in recognition of the national emergency that was declared by the President of the United States on March 13, 2020, the Court provided that all conferences scheduled to be held in the courthouse comprising the White Plains Division of the Bankruptcy Court will be conducted through Zoom. All attorneys, witnesses and parties wishing to appear at, or attend, a telephonic hearing or conference must contact the Court at (914) 467-7250 to register for attendance at the Hearing. Pro se parties may participate in the hearing free of charge using Zoom.

### I. <u>FEE MATTERS</u>:

1. Third Interim Report of ASK LLP For Allowance of Compensation and Reimbursement of Expenses As Counsel to the Litigation Designees For The Period of July 1, 2021 Through October 31, 2021 [ECF No. 10144]

Response Deadline: January 7, 2022 at 4:00 p.m. (Eastern Time)

Responses Filed: None.

#### Related Documents:

- A. Certificate of No Objection [ECF No. 10695]
- B. Notice of Status Conference [ECF No. 10723]

<u>Status</u>: This matter is going forward solely as a status conference.

2. Final Fee Application of Stout Risius Ross, LLC Real Estate Consultant and Advisor for the Debtor for the Period from November 21, 2018 through and including June 30, 2019 [ECF No. 10667]

Response Deadline: November 7, 2022 at 4:00 p.m. (Eastern Time)

Responses Filed: None.

#### Related Documents:

- A. Notice of Hearing [ECF No. 10668]
- B. Certificate of No Objection [ECF No. 10724]

Status: This matter is going forward on an uncontested basis.

## II. <u>ADJOURNED MATTERS</u>:

3. Debtors' (A) Objection to Claim 26186 of Texas Comptroller of Public Accounts on Behalf of the State of Texas and Local Sales Tax Jurisdictions, and (B) Motion for Turnover of Property of the Estate and Application of Funds Owed to Debtors in Satisfaction of Claims 20615, 26368, 20373, and 20614, or, in the Alternative, (C) Motion for an Order, Pursuant to Sections 105(a) and 502(c) of the Bankruptcy Code, Estimating Claims [ECF No. 10461]

Response Deadline: June 17, 2022 at 4:00 p.m. (Eastern Time)

Responses Filed: None.

Related Documents: None.

Status: This matter is has been adjourned to a date to be determined.

4. Twelfth Quarterly Report of Katten Muchin Rosenman LLP, as Special Avoidance Counsel for the Debtors, for Allowance of Contingent Fees and Reimbursment of Expenses for the Period from April 1, 2022 through June 30, 2022 [ECF No. 10532]

Response Deadline: August 18, 2022 at 4:00 p.m. (Eastern Time)

Responses Filed: None.

#### **Related Documents:**

- A. Notice of Hearing [ECF No. 10672]
- B. Notice of Adjournment [ECF No. 10729]

Status: This matter has been adjourned to December 21, 2022 at 2:00 p.m. (Prevailing Eastern Time).

5. Twelfth Quarterly Report of Stretto for Allowance of Contingent Fees and Reimbursement of Expenses for the Period from April 1, 2022 through June 30, 2022 [ECF No. 10533]

Response Deadline: August 18, 2022 at 4:00 p.m. (Eastern Time)

Responses Filed: None.

### **Related Documents:**

A. Notice of Hearing [ECF No. 10672]

# B. Notice of Adjournment [ECF No. 10729]

Status: This matter has been adjourned to December 21, 2022 at 2:00 p.m. (Prevailing Eastern Time).

Dated: November 16, 2022 New York, New York

/s/ Garrett A. Fail

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